

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350

Internet Address: <http://www.dps.state.ny.us>

PUBLIC SERVICE COMMISSION

MAUREEN O. HELMER
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December 2, 1999

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Hon. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W., Rm. TW-A325
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DEC - 3 1999

FCC MAIL ROOM

Re: Petition of the Indiana Utility Regulatory
Commission for Additional Delegated Authority
to Implement Number Conservation Measures;
NSD File No. L-99-82; CC Docket No. 96-98;
Delegated Authority Number 99-2456

Dear Secretary Salas:

The New York State Department of Public Service ("NYDPS") files this letter in support of the Indiana Utility Regulatory Commission's ("Indiana URC") request to implement various number conservation measures. The Indiana URC, like many state commissions, is facing increased pressures to adopt area code relief plans at an unprecedented pace. The NYDPS recognizes that the increased demand for central office codes (NXXs), and the concurrent exhaust of area codes, is in part the result of increased local competition, which we fully support. However, the rapidly declining number of available NXXs is also directly attributable to inefficient and ineffective industry number assignment and utilization practices.

We ask that states, such as Indiana, be allowed to adopt efficient number utilization methods and efficient number conservation measures. States play an important role in addressing area code relief, and the requested authority is one more way to pursue reasonable number conservation measures.

Various carriers have previously suggested that the Commission should not allow states to implement efficient number utilization measures or efficient conservation measures until the Commission adopts national rules. This suggestion, if followed, would forestall efficient number use in the name of industry

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Hon. Magalie Roman Salas

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convenience. We recognize that the Commission is examining various number conservation measures to improve the efficient allocation and utilization of numbering resources.¹ However, efficient numbering utilization and conservation measures should not be delayed any longer than necessary. The Commission should continue to allow states to prevent premature area code exhaust by granting Indiana additional delegated authority to adopt number conservation measures, as it has granted other states, including New York. In so doing, states will continue to minimize customer and carrier costs as well as the confusion that occurs with frequent area code changes. We support Indiana's request for additional delegated authority and urge the Commission to approve Indiana's petition.

Sincerely,



Lawrence G. Malone
General Counsel

cc: Network Service Division
All Parties

¹ In the Matter of Numbering Resources Optimization, CC Docket No. 99-200, Notice of Proposed Rulemaking (released June 2, 1999).

In the Matter of

Re: Petition of the Indiana Utility Regulatory
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CERTIFICATE OF SERVICE

I, Lucille T. Dillenbeck, hereby certify that an original and four (4) copies of the letter in support of the Indiana Utility Regulatory Commission's Petition in the above-captioned proceeding were sent via Airborne Express to Magalie Roman Salas, Secretary of the Federal Communications Commission. In addition, a copy was filed using the Commission's Electronic Filing System and copies were sent by First Class Mail, postage prepaid, to all parties on the attached service list.


Lucille T. Dillenbeck

Dated: December 2, 1999
Albany, New York

James Lanni
Rhode Island Division
of Public Utilities
100 Orange Street
Providence, RI 02903

Joel B. Shifman
Maine Public Utility Commission
State House Station 18
Augusta, ME 04865

Charles F. Larken
Vermont Department of
Public Service
120 State Street
Montpelier, VT 05602

Rita Barmen
Vermont Public Service Board
89 Main Street
Montpelier, VT 05602

Keikki Leesment
New Jersey Board of
Public Utilities
2 Gateway Center
Newark, NJ 07102

Veronica A. Smith
Deputy Chief Counsel
Pennsylvania Public Utility
Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Marlene L. Johnson
Chairperson
District of Columbia
Public Service Commission
717 14th Street, N.W.
Washington, DC 20005

Telecommunications Report
1333 H Street, N.W. - 11th Floor
West Tower
Washington, DC 20005

International Transcription
Services, Inc.
1231 20th Street
Washington, DC 20036

Brad Ramsay
NARUC
1101 Vermont Avenue, N.W.
Suite 200
Washington, DC 20005

Lawrence Strickling, Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Camille Stonehill
State Telephone Regulation
Report
1101 King Street
Suite 444
Alexandria, VA 22314

Jim Sullivan, President
Alabama Public Service
Commission
P.O. Box 304260
Montgomery, AL 36130-4260

Richard Collier
Chief Counsel
Tennessee Regulatory Authority
460 James Robertson Pky.
Nashville, TN 37243-0505

Sandy Ibaugh
Indiana Utility
Regulatory Commission
901 State Office Bldg.
Indianapolis, IN 46204

Ronald Choura
Michigan Public
Service Commission
6545 Mercantile Way
Lansing, MI 48910

Mary Street
Iowa Utilities Board
Lucas Building
5th Floor
Des Moines, IA 50316

Gary Evenson
Wisconsin Public
Service Commission
P.O. Box 7854
Madison, WI 53707

Gordon L. Persinger
Missouri Public Service
Commission
P.O. Box 360
Jefferson City, MO 65102

Sam Loudenslager
Arkansas Public Service
Commission
1200 Center Street
P.O. Box C-400
Little Rock, AR 72203

Maribeth D. Swapp
Deputy General Counsel
Oklahoma Corp. Commission
400 Jim Thorpe Building
Oklahoma City, OK 73105

Marsha H. Smith
Idaho Public Utilities
Commission
Statehouse
Boise, ID 83720

Edward Morrison
Oregon Public Utilities
Commission
Labor and Industries Bldg.
Room 330
Salem, OR 97310

Mary Adu
Public Utilities Commission of the
State of California
505 Van Ness Avenue
San Francisco, CA 94102

Rob Vandiver
General Counsel
Florida Public Service
Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Glenn Blackmon
Washington U&TC
1300 S. Evergreen Park Dr., S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Myra Karegianes
General Counsel
Illinois Commerce Commission
State of Illinois Building
160 No. LaSalle - Suite C-800
Chicago, IL 60601-3104

Ann Seha
Assistant Attorney General
Manager, Public Utilities Division
121 7th Place East, Suite 350
St. Paul, MN 55101

Robin McHugh
Montana PSC
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620-2601

Deonne Brunning
Nebraska PSC
1200 N. Street
Lincoln, NE 68508

Diane Munns
Commissioner
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Glen F. Ivey
Chairman
Maryland Public Service Commission
6 St. Paul Street
16th Floor
Baltimore, MD 21202-6806

The Hon. Michael K. Powell
Commissioner
Federal Communications Commission
445 12th Street, S.W., 8th Fl
Washington, D.C. 20554

The Hon. Gloria Tristani
Commissioner
Federal Communications Commission
445 12th Street, S.W., 8th Fl
Washington, D.C. 20554

The Hon. William E. Kennard
Chairman
Federal Communications Commission
445 12th Street, S.W., 8th Fl
Washington, D.C. 20554

The Hon. Susan Ness
Commissioner
Federal Communications Commission
445 12th Street, S.W., 8th Fl
Washington, D.C. 20554

The Hon. Harold Furchgott-Roth
Commissioner
Federal Communications Commission
445 12th Street, S.W., 8th Fl
Washington, D.C. 20554

Bill Allan
Bell Atlantic Telephone Corp.
158 State Street
Albany, New York 12207

Mary Liz Hepburn
Bell Atlantic Telephone Corp.
1300 I Street, N.W.
Washington, D.C. 20005

John M. Goodman
Attorney for Bell Atlantic
1300 I Street, NW
Washington, D.C. 20005

Helen M. Mickiewicz
Senior Staff Attorney
California Public Utilities
Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

John R. Hoffman, Chairman
North American Numbering Council
6607 Willow Lane
Mission Hills, Kansas 66208-1974

Ronald J. Binz, Co-Chair
North American Numbering Council
Competition Policy Institute
3773 Cherry Creek, North Drive,
Suite 1050
Denver, Colorado 80209

Yog Varma
Deputy Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Blaise Scinto
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Al McCloud
Network Services Division
Federal Communications Commission
Portals II, 445 12th Street, S.W.
Suite 6A-320
Washington, D.C. 20554

Karlen Reed
Massachusetts Dept. of
Telecommunications
100 Cambridge Street, 12th Fl
Boston, MA 02206

Trina M. Bragdon
Maine Public Utilities
242 State Street
18 State House Station
Augusta, Maine 04333-0018

Cynthia B. Miller
Senior Attorney
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850